

REMARKS/ARGUMENTS

Claims 1-10 and 23-32 were pending. Within the Office Action, claims 1-10, and 23-32 are rejected under 35 U.S.C. § 103(a). By way of the above amendments, claims 27 and 32 have been amended. Accordingly, claims 1-10 and 23-32 are now pending. The Applicants request reconsideration in light of the amendments made above and the arguments made below.

Response to Arguments

Within the Office Action, it is stated that U.S. Patent No. 6,981,055 to Ahuja et al., at col. 5, lines 23-26, and col. 12, lines 4-7, discloses calculating a plurality of application-specific performance scores. Ahuja shows no such thing.

At col. 5, lines 23-25, Ahuja states, “Even the type of traffic (e.g., data vs. voice over IP) could be used as input to routing optimization component [104].” At col. 12, lines 4-7, Ahuja states, “If other variables are deemed relevant to the route selection process, such as the type of traffic, then they should also be made available to the routing optimization component 104.” In other words, a type of traffic can be one variable used to determine a cost associated with a routing table. Thus, Ahuja discloses generating an application *dependent* score: a score that depends on input that includes a type of application.

In contrast, claim 1 recites an application-*specific* score. That is, a score that is tailored to more accurately indicate a performance for a specific application. The Specification, at page 15, lines 1-16, gives examples of parameters for calculating application-specific performance scores. In short, a score that takes an application as input is different from an application-*specific* performance score.

Rejections under 35 U.S.C. § 103(a)

Claims 1-5, 7-10, 23-26, 30, and 31

Within the Office Action, claims 1-5, 7-10, 23-26, 30, and 31 are rejected under 35 U.S.C. § 103(a) as being anticipated by Ahuja in view of U.S. Patent No. 7,123,620 to Ma. The Applicants respectfully traverse these rejections.

Ahuja discloses a system for and method of routing traffic using a performance monitoring and inference component 102, a routing optimization component 104, and a BGP bridge component 106. (Figure 2, Ahuja) As described above, however, Ahuja does not disclose

generating application-specific performance scores. Also, as admitted in the Office Action, Ahuja does not disclose “determining a prefix for the data flow, wherein the prefix corresponds to an application selectable from a plurality of applications.”

Ma is directed to routing data packets through a data communications network using global path identifiers. At col. 4, lines 40-43, cited within the Office Action, Ma discloses that bandwidth requirements of applications are increasing with the integration of voice, video, and data traffic. At col. 12, lines 38-60, also cited within the Office Action, Ma discusses Quality of Service (QoS) guarantees. Contrary to the characterization within the Office Action, these teachings have nothing to do with “determining a prefix for the data flow, wherein the prefix corresponds to an application selectable from a plurality of applications,” as recited in claim 1.

Claim 1 is directed to a method of routing a data flow traversing one or more routers in an internetwork. The one or more routers are coupled to a plurality of service provider access links (SPALs). The method recites, in part, determining a prefix for the data flow, wherein the prefix corresponds to an application selectable from a plurality of applications, and calculating a plurality of application-specific performance scores for the plurality of SPALs. As explained above, neither Ahuja nor Ma discloses calculating application-specific performance scores or determining a prefix for a data flow, wherein the prefix corresponds to an application selectable from a plurality of applications. For at least these reasons, claim 1 is allowable over Ahuja, Ma, and their combination.

Claims 2-5, 7-10, 23-26, 30, and 31 all depend from claim 1, and are thus all allowable as depending on an allowable base claim.

Claim 6

Within the Office Action, claim 6 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Ahuja, in view of Ma, and further in view of U.S. Patent No. 6,981,055 to Gossett Dalton, Jr., et al. The Applicants respectfully traverse this rejection.

Gossett Dalton, Jr., is directed to “a centralized routing engine that is able to assist gateways in making routing decisions for calls being placed in an IP network environment.” (Gossett Dalton, Jr., Abstract) The calls include voice, fax, and video. *Id.* A source gateway operator is able to set preferences for routing calls. *Id.* The source gateway operator does not, however, determine a prefix for a data flow, where each prefix corresponds to an application selectable from a plurality of applications, for applications such as HTTP, voice, and video. Similar to Ahuja and Ma, Gossett Dalton, Jr., does not disclose calculating application-specific

performance scores.

As explained above, claim 1 recites calculating application-specific performance scores for selected applications and also determining a prefix for the data flow, wherein the prefix corresponds to an application selectable from a plurality of applications. Neither Ahuja, nor Ma, nor Gossett Dalton, Jr., either alone or in combination, discloses these elements. For at least these reasons, claim 1 is allowable over Ahuja, Ma, Gossett Dalton, Jr., and their combination. Because claim 6 depends from claim 1, claim 6 is also allowable as depending on an allowable base claim.

Claims 27-29 and 32

Within the Office Action, claims 27-29 and 32 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Ahuja in view of U.S. Patent No. 6,963,575 to Sistanizadeh et al. The Applicants respectfully traverse these rejections.

Sistanizadeh is directed to regional and wide-area networks. The networks include a backbone network and a plurality of access networks. Sistanizadeh does not disclose that a rank of the update request for a prefix in the queue is dependent on a potential percent improvement of a performance score resulting from moving the prefix from its current route to a pending winner route; Sistanizadeh does not disclose determining prefixes corresponding to applications and calculating application-specific performance scores; and Sistanizadeh does not disclose unpacking a group of prefixes into component prefixes in the event a change in a performance score for the group above a threshold level is determined and generating performance scores corresponding to each of the component prefixes.

Claim 27 is directed to a method of routing from a source node to a group of destination nodes having a common prefix. Claim 27 recites, in part, implementing a route update request according to a priority queue. The route update request corresponds to a superior performance score, and a rank of the update request for a prefix in a priority queue is dependent on a *potential percent improvement of a performance score resulting from moving the prefix from its current route to a pending winner route*. The italicized language finds support in the Specification at, for example, page 20, lines 4-6. Neither Ahuja nor Sistanizadeh, either alone or in combination, teaches that a rank of the update request for a prefix in a priority queue is dependent on a potential percent improvement of a performance score resulting from moving the prefix from its current route to a pending winner route. For at least this reason, claim 27 is allowable over Ahuja, Sistanizadeh, and their combination.

Claim 32 is directed to a method of routing from a source node to a group of destination nodes having a common prefix. Claim 32 recites, in part, generating a plurality of performance scores for a plurality of routes from the source node to the group of destination nodes. Each performance score corresponds to an access link from one or more access links. A performance score from the plurality of performance scores is determined by unpacking the group into component prefixes *in the event a change in a performance score for the group above a threshold level is determined* and generating performance scores for each of the component prefixes. The added, italicized language finds support in the Specification at, for example, page 11, lines 13-15. Neither Ahuja nor Sistanizadeh, either alone or in combination, discloses unpacking a group into component prefixes in the event a change in a performance score for the group above a threshold level is determined. For at least this reason, claim 32 is allowable over Ahuja, Sistanizadeh, and their combination.

CONCLUSION

For the reasons given above, the Applicants respectfully submit that claims 1-10 and 23-32 are in condition for allowance, and allowance at an early date would be appreciated. If the Examiner has any questions or comments, the Examiner is encouraged to call the undersigned at (408) 530-9700 so that any outstanding issues can be quickly and efficiently resolved.

Respectfully submitted,
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